

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) CRIMINAL ACTION
V.) NO. 04-10357-mel
)
RASHIEK CANNON)

EX PARTE MOTION FOR PRODUCTION OF
MASSACHUSETTS REGISTRY OF MOTOR VEHICLE DOCUMENTS

Now comes the defendant in the above-captioned case and requests that this court order the Massachusetts Registry of Motor Vehicles to provide defense counsel with copies of the citations written by Troopers McCarthy, Lopes and Telford of the Massachusetts State Police for the period October 5, 2003 to October 5, 2005.

As reason therefore, the defendant says that these records will contain the race of the individuals to whom this officer issued citations. This information is relevant and material to a motion to suppress because it can be used to determine whether profiling occurred.

For the defendant,

Edward L. Hayden

EDWARD L. HAYDEN
7 FRANKLIN STREET
LYNN MA 01902
(781) 599-1190
BBO #226430

12/5/06

N. Russo

ALLOWED, the Government not opposing.

DEC - 5 2006